

DONALD J. GREEN, ESQ.  
Nevada Bar No. 1869  
California Bar No. 112495  
4760 South Pecos Road, Suite 103  
Las Vegas, Nevada 89121  
Cell: (702) 409-8239  
Fax: (855) 459-8472  
[CrimeLV7777@aol.com](mailto:CrimeLV7777@aol.com)  
Attorney for Defendant  
**CHARLES ELLIS**

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	<b>Case No.: 2:18-CR-00255-JAD</b>
	)	
Plaintiff,	)	
	)	
	)	<b><u>SENTENCING MEMORANDUM</u></b>
	)	
vs.	)	
	)	
CHARLES ELLIS,	)	
Defendant.	)	
	)	

**CERTIFICATION: This SENTENCING MEMORANDUM is timely filed.**

COME NOW, defendant CHARLES ELLIS, by and through his counsel Donald J. Green, Esq., who submits this SENTENCING MEMORANDUM for the Sentencing now set for November 8, 2023.

Standing before the Court is Charles Ellis, now convicted of the crimes stated in the Indictment. His voluntary Guilty Plea was the product of a deep, self-evaluation of his own conduct which has led to the Sentencing.

The defendant understands that he will be sent to prison.

The following requests are being made:

1. Due to his serious, ongoing medical issues, defendant is requesting a SELF-SURRENDER date of January 31, 2024.

Why?

1           A.    Due to limited financial resources, defendant was  
2               permitted to reside in Dolan Springs, Arizona.

3           B.    Defendant has made every required court appearance.

4           C.    Defendant poses no risk of non-appearance. The Court  
5               is respectfully reminded that on or about August 2018  
6               over 5 years ago, defense counsel Green actually  
7               surrendered defendant to ATFE Agents in the back of  
8               the Lloyd D George Federal Courthouse. This self-  
9               surrender was arranged among the US Attorney, the  
10              ATFE Agents and defense counsel. On the date of the  
11              surrender, defendant was later released by the United  
12              States Magistrate Judge.

13         2.    Due to his serious, ongoing medical issues, defendant is  
14              requesting a recommended placement at a USBOP Facility with  
15              a hospital or at which there is acute medical care.

16           A.    Defendant has recently been released from the  
17               hospital after having suffered a stroke.

18           B.    Defendant has a serious heart condition.

19           C.    Defendant is a diabetic.

20           D.    Defendant is still recovering from an attack by a  
21               Wild Hog in Arizona on Thanksgiving Day 2022.  
22               Defendant was rushed to medical care. Thereafter,  
23               defendant underwent RABIES VACCINATIONS, which were  
24               even scheduled during the trial phase of this case.  
25               The injuries from this animal attack have not  
26               resolved. Defendant is still undergoing medical  
27               treatment.

1 Defendant worked all of his adult life. To this day, even after  
2 being discharged in the year 2018 from his job where he worked for  
3 nearly 19 years, defendant has been self-employed. He even bought two  
4 water trucks so that he could start and operate his licensed business  
5 to provide water to many low-income and senior citizen residents of  
6 Dolan Springs, Arizona. His customers will miss him.

7 Defendant is contrite: accepting full responsibility for his  
8 crimes. Defendant doesn't blame anyone but himself.

9 Therefore, defendant respectfully requests that the Court  
10 sentence him to not more than 45 months with a variance on each count  
11 to run concurrently as specified on page 19 of the Pre-Sentence  
12 Report.

13 Dated: 11/7/2023

Respectfully submitted,

14 \_\_\_\_\_Donald J. Green\_\_\_\_11/7/2023  
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18 **CERTIFICATE OF ELECTRONIC SERVICE**

19 The undersigned certifies that a true and correct copy of the  
20 foregoing SENTENCING MEMORANDUM was electronically served on the  
21 following:

22 **JASON M. FRIERSON**  
23 **UNITED STATES ATTORNEY**  
24 **EDWARD G. VERONDA**  
**Assistant U.S. Attorney**

25 By \_\_\_\_\_Donald J. Green\_\_\_\_11/7/2023  
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